



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SEP 09 2010

Mr. Gary Kassof  
Bridge Program Manager  
First Coast Guard District  
Battery Building  
One South Street  
New York, NY 10004

Dear Mr. Kassof:

The Environmental Protection Agency (EPA) has reviewed the final environmental impact statement (FEIS) for the Goethals Bridge Replacement Project (GBR) (CEQ#20100313) between Staten Island, New York and Elizabeth, New Jersey. This review was conducted in accordance with Section 309 of the Clean Air Act, as amended (42 U.S.C 7609, PL 91-604 12 (a), 84 Stat. 1709) and the National Environmental Policy Act (NEPA).

The Goethals Bridge, constructed in the 1920s, provides a link over the Arthur Kill along Interstate 278 which begins as U.S. Route 1/9 in Linden, New Jersey, and continues across northern Staten Island as the Staten Island Expressway, and then across the Verrazano Bridge into Brooklyn and Queens. The Port Authority of New York and New Jersey (PANYNJ) owns and operates the Goethals Bridge. The purpose of the proposed project is to eliminate the functional and physical obsolescence of the existing bridge, and address the aging structure's escalating maintenance, repair, and structural needs and costs.

With regard to the project's general conformity determination, the emissions analysis should include any construction activities that will be permitted by the Army Corps of Engineers. Project-related emissions resulting from the actions of multiple Federal agencies cannot be separated for the purposes of a general conformity applicability analysis or determination. Also, EPA understands that the Port Authority of New York and New Jersey has proposed to use supplemental emission credits from the Harbor Deepening Project to offset the emissions from the Goethals Bridge project. As a member of the Regional Air Team, EPA requests that a consensus concerning the mobile source offset for this project is gained from the Regional Air Team before moving forward on this decision.

Thank you for the opportunity to comment. If you have any questions, please call  
Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Filippelli". The signature is fluid and cursive, with a prominent "J" and "F".

John Filippelli, Chief  
Strategic Planning and Multi-Media Programs Branch